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**[INSERT NAME]**  
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: **[INSERT CASE NAME]**  
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

**MOS NAME: ROBERT PAGAN**

**MOS TAX: [REDACTED]**

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

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**DISCLOSURE #1:**

MOS PAGAN PLED GUILTY TO THE FOLLOWING CHARGES AND SPECIFICATIONS WHICH OCCURRED WHILE ASSIGNED TO THE 122 PRECINCT AND OFF DUTY:

1. ON AUGUST 19, 2019 IN THE VICINITY OF RICHMOND COUNTY, ENGAGED IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY OR DISCIPLINE OF THE DEPARTMENT IN THAT MOS PAGAN ENGAGED IN A PHYSICAL ALTERATION WITH A PERSON KNOWN TO THE DEPARTMENT. MOS PUNCHED PERSON KNOWN TO THE DEPARTMENT IN THE EYE.

ACTION TAKEN: THIRTY-TWO (32) PRE-TRIAL SUSPENSION DAYS WITHOUT PAY AND COUNSELING

**Disclosure #2:**

MOS PAGAN WAS ADJUDICATED GUILTY OF THE FOLLOWING DEPARTMENTAL CHARGES AND SPECIFICATIONS, DATED 02/16/2015:

ALLEGATION(S):

1. MOS PAGAN WRONGFULLY UTILIZED A DEPARTMENT COMPUTER ON THREE SEPARATE DATES TO MAKE AN INQUIRY UNRELATED TO THE OFFICIAL BUSINESS OF THE DEPARTMENT AND HE FAILED TO MAINTAIN HIS ACTIVITY LOG.

ACTION TAKEN: FORFEITURE OF ONE (1) VACATION DAY.

**Disclosure #3**

IN REGARD TO CCRB CASE 201800734, THE CCRB INVESTIGATED ALLEGATIONS THAT:

ON JANUARY 29, 2018, AT APPROXIMATELY 6:14 A.M., [REDACTED] AWOKE TO SOMEONE BANGING ON THE DOOR TO HER APARTMENT. [REDACTED] OPENED THE DOOR AND SAW MOS PAGAN. MOS PAGAN STUCK HIS FOOT IN THE DOOR, SO THAT [REDACTED] COULD NOT SHUT THE DOOR. MOS PAGAN ASKED FOR IDENTIFICATION. [REDACTED] TOLD THE OFFICERS THAT SHE WOULD BE RIGHT BACK AT WHICH POINT, MOS PAGAN PUSHED THE DOOR OPEN, AND ALL THREE OFFICERS ENTERED AND SEARCHED THE HOME.

AS THE OFFICERS WERE LEAVING, THEY ASKED [REDACTED] WHERE [REDACTED] WAS LOCATED. [REDACTED] EXPRESSED DISCONTENT THAT THIS WAS WHAT HER TAX DOLLARS WERE GOING TOWARDS. [REDACTED] ALLEGEDLY RESPONDED, "LIKE YOU PAY TAXES".

THE CCRB REVIEW BOARD SUBSTANTIATED THE FOLLOWING ALLEGATIONS AGAINST MOS PAGAN:  
ABUSE OF AUTHORITY – ENTRY OF PREMISES  
ABUSE OF AUTHORITY – SEARCH OF PREMISES

AS A RESULT, THE NYPD ISSUED CHARGES AND SPECIFICATIONS AGAINST MOS LOPICCOLO:

1. MOS PAGAN, ON OR ABOUT JANUARY 29, 2018 AT APPROXIMATELY 0614, WHILE ASSIGNED TO WARRANTS SECTION AND ON DUTY IN THE VICINITY OF RICHMOND COUNTY, ABUSED HIS AUTHORITY AS A MEMBER OF THE NEW YORK CITY POLICE DEPARTMENT IN THAT HE ENTERED THE FIRST FLOOR APARTMENT OF A PERSON KNOWN TO THE NYPD.
2. MOS PAGAN, ON OR ABOUT JANUARY 29, 2018 AT APPROXIMATELY 0614, WHILE ASSIGNED TO WARRANTS SECTION AND ON DUTY IN THE VICINITY OF RICHMOND COUNTY, ABUSED HIS AUTHORITY AS A MEMBER OF THE NEW YORK CITY POLICE DEPARTMENT IN THAT HE SEARCHED THE FIRST FLOOR APARTMENT WITHOUT SUFFICIENT LEGAL AUTHORITY.

DISPOSITION: GUILTY AFTER TRIAL

ACTION TAKEN: FORFEIT SEVEN (7) VACATION DAYS,

**Disclosure #4 (PENDING)**

THE FOLLOWING ALLEGATIONS, DATED 02/27/21, ARE PENDING AGAINST MOS PAGAN

[REDACTED]

CASE STATUS: PENDING

**IN ADDITION, BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH FEBRUARY 02, 2021, THE PEOPLE ARE UNAWARE OF ANY PENDING AND OR SUBSTANTIATED CCRB ALLEGATIONS.**

**Disclosure # 5**

CCRB CASE: 201800734

REPORT DATE: 1/29/2018

INCIDENT DATE: 1/29/2018

SUBSTANTIATED CCRB ALLEGATION(S):

1. Abuse – entry of premises
2. Abuse – search of premises

**Disclosure # 6: (PENDING)**

CCRB CASE: 202000487

REPORT DATE: 1/21/2020

[REDACTED]

**Disclosure # 7: (PENDING)**

CCRB CASE: 202001486

REPORT DATE: 02/21/2020

INCIDENT DATE: 2/18/2020

[REDACTED]